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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE LINKEDIN USER PRIVACY
LITIGATION

Case No. 12-cv-03088-EJD

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING DEADLINES
FOR MOTION TO DISMISS SECOND
AMENDED CONSOLIDATED CLASS
ACTION COMPLAINT AND
RELATED BRIEFING**

Judge: Hon. Edward J. Davila

Action Filed: June 15, 2012

1 Plaintiff Khalilah Wright (“Plaintiff”) and Defendant LinkedIn Corporation (“Defendant” or
2 “LinkedIn”) (collectively, the “Parties”), by and through their undersigned counsel, respectfully
3 stipulate and agree to a brief extension of deadlines for LinkedIn’s motion to dismiss Plaintiff’s
4 Second Amended Consolidated Class Action Complaint, Plaintiff’s opposition to the motion, and
5 LinkedIn’s reply in support of the motion. In support of this Stipulation, the Parties state as
6 follows:

7 WHEREAS, on December 20, 2012, LinkedIn filed its Motion to Dismiss Plaintiffs’ First
8 Amended Consolidated Class Action Complaint (Dkt. 59), which this Court granted on March 6,
9 2013 (Dkt. 72);

10 WHEREAS, pursuant to this Court’s March 6, 2013 Order Granting Defendant’s Motion to
11 Dismiss, Plaintiffs were granted leave until April 5, 2013 to amend their Complaint (Dkt. 72);

12 WHEREAS, on April 3, 2013, the Parties stipulated to an extension of time for Plaintiffs to
13 file the Second Amended Consolidated Class Action Complaint (“SAC”), to a deadline for LinkedIn
14 to answer, move against, or otherwise respond to the SAC, and to a briefing schedule for any
15 motion challenging the SAC, subject to Court approval to the extent required under applicable rules
16 (Dkt. 75), and the Court so ordered the stipulated requests (Dkt. 77);

17 WHEREAS, under Civil Local Rules 6-1(b) and 6-2 the Court may extend the time for a
18 party to complete any required act, and Civil Local Rule 6-1(a) provides that parties may stipulate
19 in writing, without a Court order, to extend the time within which to answer or otherwise respond to
20 a complaint, or to enlarge or shorten the time in matters not required to be filed or lodged with the
21 Court, provided the change will not alter the date of any event or any deadline already fixed by
22 Court order;

23 WHEREAS, a number of scheduling conflicts have arisen for several of LinkedIn’s inside
24 counsel and outside counsel since the Parties’ April 3rd stipulation regarding scheduling that
25 warrant a brief extension of the current schedule, and Plaintiff is agreeable to such an extension;

26 WHEREAS, such an extension will not alter any scheduled hearing date;
27
28

1 WHEREAS, the Parties have conferred and agree to stipulate under Civil Local Rule 6-1(a)
2 to extend LinkedIn's time within which to respond to the SAC and, anticipating that LinkedIn will
3 move to dismiss the SAC, to stipulate under Civil Local Rules 6-1(b) and 6-2 to set dates for
4 Plaintiff's opposition and LinkedIn's reply;

5 NOW THEREFORE, the Parties hereby stipulate and agree as follows, subject to Court
6 approval as required for provision (2):

7 (1) LinkedIn's deadline to answer, move against, or otherwise respond to the SAC shall
8 be June 13, 2013.

9 (2) If LinkedIn elects to respond to the SAC by filing a motion, then Plaintiff's deadline
10 to file an opposition shall be July 25, 2013, and LinkedIn's deadline to file a reply
11 shall be August 22, 2013.

12 EDELSON LLC

13 Dated: May 29, 2013

By: /s/ Ari J. Scharg
Attorneys for Plaintiffs

15 COOLEY LLP

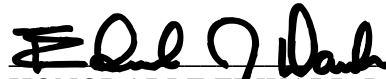
16 Dated: May 29, 2013

By: /s/ Matthew D. Brown
Attorneys for Defendant LinkedIn Corporation

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 30, 2013


HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I, Matthew D. Brown, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: May 29, 2013

/s/ Matthew D. Brown

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